

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

Hearing Date and Time:
April __, 2023 at __

**NOTICE OF DEBTOR'S MOTION FOR APPROVAL OF SERVICE
PROCEDURES FOR SUMMONS, COMPLAINT, AND OTHER PLEADINGS**

PLEASE TAKE NOTICE that, on the date set by the Court pursuant to a proposed Order Shortening Time ("OST") and Application therefor to be submitted,

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

LTL Management LLC, the debtor in above-captioned chapter 11 case (the “Debtor”), by and through its counsel, shall move (the “Motion”)² before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an order authorizing it to serve the complaint, summons and other pleadings in the above-captioned Adversary Proceeding on the known defendants in this Adversary Proceeding in care of their respective counsel of record in related talc-related litigation pending against the Debtor and/or any of the Protected Parties in lieu of service directly on the individual Talc Claimants.

PLEASE TAKE FURTHER NOTICE that, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor’s proposed undersigned counsel, (b) the Office of the United States Trustee for the District of New Jersey, (c) the Talc Firms, as set forth in Appendix A to the Complaint, (d) counsel to the Debtor’s non-debtor affiliates, Johnson & Johnson Holdco (NA) Inc., Johnson & Johnson Inc. and Johnson & Johnson, and (e) any other party entitled to notice in accordance with any OST entered by the Court.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

Dated: April 4, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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